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**THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

ODETTE R. BATIS, on behalf of herself and  
all others similarly situated,

Plaintiff,

v.

DUN & BRADSTREET HOLDINGS, INC.,  
Defendant.

Case No. 22-cv-01924-MMC

**STIPULATED REQUEST FOR ORDER  
MODIFYING BRIEFING SCHEDULE**

Complaint Filed: March 25, 2022

Pursuant to Local Rule 6-2, Plaintiff Odette R. Batis (“Plaintiff”) and Defendant Dun & Bradstreet Holdings, Inc. (“Defendant”) (collectively, the “Parties”), by and through their respective counsel, hereby submit this stipulated request to modify the briefing schedule related to Defendant’s Special Motion to Strike Complaint Pursuant to Cal. Civ. Proc. Code § 425.16

and, in the alternative, Motion to Dismiss Pursuant to Fed. R. Civ. Proc. 12(b)(1) and 12(b)(6) (Doc. No. 18), such that Plaintiffs' opposition to the Motion shall be due on July 28, 2022, and Defendant's reply shall be due on August 18, 2022. In support of this stipulation, the Parties state as follows:

1. Plaintiff filed her Complaint on March 25, 2022. (Doc. No. 1).

2. The Parties stipulated to an extension of time for Defendant to answer or otherwise respond to June 30, 2022. (Doc. No. 11). This Court granted that request. (Doc. No. 14). This Court also continued the Case Management Conference to August 12, 2022, at 10:30 a.m., with the Joint Case Management Statement due no later than August 5, 2022. (Doc. No. 14).

3. Defendant filed its Motion on June 30, 2022 (Doc. No. 18). Pursuant to Local Rule 7-3, Plaintiff's response to the Motion is due on July 14, 2022, and Defendant's Reply is due on July 21, 2022. The Motion Hearing is set for August 5, 2022, at 9:00 a.m. (Doc. No. 18).

4. Due to planned family vacations, the Fourth of July holiday, and upcoming commitments in other pending cases, the parties agreed to an additional two weeks each to prepare and file the remaining briefing on Defendant's Motion.

5. The Parties therefore respectfully request that this Court extend the deadline for Plaintiff's opposition to the Motion from July 14, 2022, to July 28, 2022, and for Defendant's reply from July 21, 2022, to August 18, 2022.

The Parties request the Court set a hearing date at its earliest convenience thereafter.

THEREFORE, the Parties respectfully request that Plaintiff have up to and including July 28, 2022, to file its opposition to Defendant's Motion, and that Defendant have up to and including August 18, 2022, to file its reply.

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 Brittany Resch (*pro hac vice*)  
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**SIGNATURE ATTESTATION**

Pursuant to Local Rule 5-1(i), I hereby attest that concurrence in the filing of this document has been obtained from each of the other Signatories.

Dated: July 7, 2022

/s/ Brittany Resch  
Brittany Resch

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Date

Honorable Maxine M. Chesney  
Senior United States District Judge

**CERTIFICATE OF SERVICE**

I, Brittany Resch, hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record via the ECF system.

DATED this 7th day of July, 2022.

TURKE & STRAUSS LLP

By: /s/ Brittany Resch

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**DECLARATION OF BRITTANY RESCH**

I, Brittany Resch, hereby declare as follows:

I am an attorney at Turke & Strauss LLP, and I serve as co-counsel for Plaintiff Odette Batis (“Plaintiff”) in the above-referenced action. I have personal knowledge of the facts set forth herein, except where stated on information and belief, and could and would competently testify to them under oath if called to do so.

As set forth in the accompanying stipulation, given summer vacations and the Fourth of July holiday, the parties have agreed to a slightly extended briefing schedule on Defendant’s anti-SLAPP Motion brought pursuant to Cal. Civ. Proc. Code § 425.16. This will result in adding one month to the briefing schedule, and the Motion will be fully briefed as of August 18, 2022.

Extending this briefing schedule means that the hearing on the Motion – currently set for August 5, 2022 – will need to be rescheduled to a later date.

This is the second request for extension of time in this matter. The first request (Doc. No. 11) was necessitated by the fact that Defendant’s agent for service of process, CT Corporation, had made an administrative error and Defendant did not learn of the lawsuit until after its response to the Complaint was due. That request was granted (Doc. No. 14).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on this 7<sup>th</sup> day of July, 2022 in Minneapolis, Minnesota.

/s/ Brittany Resch

Brittany Resch